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November 13, 2001

Gloria Blue, Executive Secretary
TPSC, Office of the USTR
600 17th Street, NW
Washington, DC 20508

Re: Product Exclusions, Certain Steel Products, USITC Inv. No. TA-201-73

Dear Secretary Blue:

On behalf of Ascometal Co. and in accordance with USTR's request for comment, 66 FR 54321 (October 26, 2001), we submit a request to exclude certain bearing quality alloy bar used in antifriction bearing systems from import relief under section 203. We attach the same information contained in this letter in the form of an Exclusion Request Data Sheet as used by the USITC.

(a) Designation under a recognized standard or certification
HTS 7227.90.20.30

(b) Description based on physical characteristics
Special grade steel used in automotive antifriction bearing applications under strict customer specifications for cleanliness, surface defects, and in-depth defects.

(c) Basis for exclusion
The domestic industry does not produce steel alloy bar used in antifriction bearing systems in sufficient quantity to meet US customers' requirements.

P-DLS006

(d) Names of domestic and foreign producers

Timken and Ascometal. Timken is the only domestic producer of bearing grade bar, but is unable to manufacture wire rod. Except for Timken, all bearing manufacturers rely on European and Japanese imports.

(e) Total US consumption 1996-2000 (in short tons) (estimate)

1996	1997	1998	1999	2000
86,541	51,264	83,596	69,041	92,041

(We are unable to provide realistic demand projections because Ascometal's sales of this product are dependent on the requirements of the US automotive industry.)

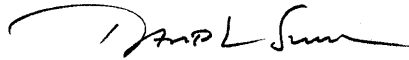
(f) Total US production 1996-2000 (in short tons) (estimate)

1996	1997	1998	1999	2000
24,000	17,000	23,000	19,000	25,000

(g) Identity of US produced substitute products

There are no substitutes for this product.

Respectfully submitted,



David L. Simon



UNITED STATES INTERNATIONAL TRADE
COMMISSION



STEEL, Inv. No. TA-201-73
EXCLUSION REQUEST DATA SHEET

If you are interested in requesting that specific products be excluded from this investigation, please supply the following information to the Commission by no later than Wednesday, October 17, 2001. Complete a separate exclusion request form for every product you are requesting an exclusion for. You may fax the completed form to the attention of D.J. Na at 202-205-3205.

Firm: ASCOMETAL	Fax #: 33 1 41 25 96 88						
Contact person: Maxime LAZARD	Email address: mlazard@ascometal.lucchini.com						
Have you submitted an exclusion request in a previous letter? NO, but the existence of a danger for the US Bearing industry in the case of limited access to foreign supply has been highlighted in Pre hearing briefs from EUROFER both at Injury and Remedy stages.							
HTS number(s) covering the product requested for exclusion: HTSUS 7227 90 20 30 in Hot Rolled bars and light shapes – Carbon & Alloy Long products.							
Detailed description of product requested for exclusion (please do not only refer to the model number): The products covered by this HTSUS number are special quality grades of steel dedicated to the end application of rolling elements (eg : balls, rollers, needles) of anti friction bearings systems used in the Automotive and other industries. These grades are offered in a wide area of dimensions (sections) with usually extremely demanding specifications covering Cleanliness, surface defects, in-depth defects, etc... US-based bearing manufacturers (like their foreign counterparts) often have their own specifications. These products have never been involved in a 201 action from the USA, especially not in the last 201 action concerning wire rods imported in the USA, probably because there is no integrated domestic wire rod manufacturer for bearing steel applications approved by bearing steel manufacturers for balls and needles. There is one American manufacturer (ie TIMKEN) of bearing grades, with no in-house wire rod manufacturing capabilities. This manufacturer, to our understanding only to fulfils its own needs (TIMKEN is an integrated manufacturer of bearings) using subcontractor for rolling. Currently all American bearing manufacturers, except TIMKEN (see above), and manufacturers of balls and needles for bearing applications rely mostly if not totally on imports from Europe and Japan. !!! Volumes hereunder cover sales on HTS US 7227 90 20 30 according to available statistics. US based manufacturers' domestic deliveries are based on our own estimates and market knowledge.							
Quantity (in short tons) of U.S. imports of product requested for exclusion:							
Source	1996	1997	1998	1999	2000	Jan.-June 2000	Jan.-June 2001
Canada	0	0	0	0	0	0	0
Mexico	0	0	0	0	0	0	0
All others	62 541	44 264	60 596	50 562	67 041	?? 34 000	?? 27 800
Total	62 541	44 264	60 596	50 562	67 041	?? 34 000	?? 27 800
Value (landed, duty-paid in U.S. dollars) of U.S. imports of product requested for exclusion:							

Source	1996	1997	1998	1999	2000	Jan.-June 2000	Jan.-June 2001
Canada	0	0	0	0	0	0	0
Mexico	0	0	0	0	0	0	0
All others	? 65 673 236	? 44 642 368	? 56 888 860	? 43 576 968	? 54 156 794		
Total	? 65 673 236	? 44 642 368	? 56 888 860	? 43 576 968	? 54 156 794		

Estimated quantity (in short tons) of U.S. producers' U.S. commercial shipments (not including internal consumption or exports) of product requested for exclusion (please indicate basis for estimates):

Source	1996	1997	1998	1999	2000	Jan.-June 2000	Jan.-June 2001
Total	24 000	17 000	23 000	19 000	25 000	13 000	10 500